May 13, 2011

John Gerritsma Field Manager Ashland Resource Area 3040 Biddle Road Medford, OR 97504

Re: Middle Applegate Pilot Project & the Pilot Joe EA

John,

Below are my comments regarding the above project, submitted as a private landowner, as the coordinator for the Applegate CWPP.

My main concern regarding this proposed project is that we are successful in getting a restoration project implemented on the ground that represents the principles of Drs. Franklin and Johnson. This project has to be ecologically acceptable to the Applegate community, viable to the BLM, and it needs to provide timber receipts to the County. And, it needs to happen in a timely manner, as you are well aware. There are many microscopes focused on what we are attempting to do in the Middle Applegate, each with a different color of lens. It's good that the new road issue seems to have gone away, as that was the main lens being used.

I feel it's extremely important that the BLM's set of initial projects are well-balanced, that they cover all of the needs of the chosen stands, and that they are implemented *together* as one project. I do not think it would be wise to sell only the commercial component and not contract any of the other aspects at the same time; the message would be that the BLM was just trying to get the cut out and really didn't care about restoration after all. Given the recent push at the national level for landscape-scale treatments for many reasons, the BLM needs to make an ecologically-balanced restoration project happen.

As for the restoration principles and how they look on the ground, I pretty much like what I've seen on the field trips, although I'm not sure how this prescription would play out over a vast majority of acres over the long run. How long before it would be viable to cut timber in the area again? And, how do the "skips and gaps" work with prescribed underburns as a maintenance tool? I think *all of us* need to know the answer to this question before the EA is signed of on.

A couple of important points, though as the Fire Plan coordinator. ALL of the Middle Applegate watershed area is within the designated wildland-urban interface or WUI. As Dr. Johnson and I discussed on the May 5th field trip, the slash from the BLM treatments needs to be removed from the stands. We cannot put more slash on the ground than is already there, especially given the skips and gaps. Large, valuable, old leave trees need to be protected from small diameter material and slash, so every "skip" should be reassessed for this, as was group-discussed on the field trip. I am encouraged by the discussions around new methods of yarding and removing materials for the project; but please don't forget that the community may also be able to play a role in this regard.

The draft update of the Applegate Fire Plan's hazardous fuels priorities has a central focus – to *maintain* the fuels treatments that have been accomplished over the past decade (both on public and private lands), in an ongoing effort to protect properties in the WUI. Therefore, during the course of the Middle Applegate Pilot project any *previous* treatments should be addressed for possible maintenance, and all *new* treatments need to be looked at in this vein – how can they be maintained over time? (The only other priorities that were defined in this area are located in the Slagle to Humbug Creek area, and from Humbug to China Gulch.)

In closing, a note again that we are being watched on this project by many people for many reasons: for the effectiveness of our collaborative efforts, for examples of the Doctors' restoration principles, to see whether landscape-scale projects can be successful, and to see whether we can significantly contribute to the O & C County coffers. We all need to be continually reminded to question the old ways and be creative in figuring out how we can, as a group, be successful with this Middle Applegate Pilot Project.

Thank you for your efforts in this regard.

Sincerely,

Sandy Shaffer Applegate Fire Plan Coordinator WUI resident